

REMARKS

Claims 1-20 were pending when last examined. Claims 21-31 have been withdrawn. All pending claims are shown in the detailed listing above.

Claim Rejections – 35 USC § 102

Claims 1-12 and 14-20 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Kledzik (US 5,266,912). Applicant respectfully traverses.

Claim 1 recites, *inter alia*, “A multi-chip module (MCM) comprising: ... a first ground plane coupled to the first IC chip” and “a second ground plane coupled to the second IC chip.” Such limitations are not disclosed or taught in Kledzik.

According to the Examiner, “Kledzik (e.g., figs. 1-3) A multi-chip module (MCM) comprising: a first integrated circuit (IC) chip 13 on a substrate 17/51; a first ground plane 33 coupled to the first IC chip; a second IC chip 17 on the substrate 17/52; and a second ground plane 21/33 coupled to the second IC chip.” Applicant respectfully disagrees.

Kledzik only describes a single ground plane 33. There is no other ground plane in Kledzik. The item identified by reference numeral 21 is an insulator of substrate 17. See e.g., col. 5, lines 51-52. Furthermore, nor are there any additional ground planes which are identified by reference numeral 33. The drawings of Figures 1-3 and the accompanying description in Kledzik only show one ground plane.

As such, Kledzik does not disclose “a first ground plane coupled to the first IC chip” and “a second ground plane coupled to the second IC chip,” as recited in claim 1. Thus, claim 1 is not anticipated by Kledzik.

For at least the reasons discussed above, Applicant respectfully requests that the rejection of claim 1 under 35 U.S.C. § 102(b) be withdrawn and this claim be allowed. Furthermore, because claims 2-12 and 14-20 depend from claim 1 and include further

limitations, Applicant respectfully requests that the rejection of these dependent claims under 35 U.S.C. § 102(b) also be withdrawn and that claims 2-12 and 14-20 be allowed.

Claim Rejections – 35 USC § 103

Claim 13 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Kledzik (US 5,266,912) in view of Wolf, *Silicon Processing For the VLSI Era*. Applicant respectfully traverses.

Claim 13 depends from claim 1, which as discussed above includes limitations not disclosed or taught in Kledzik. Such limitations are also not disclosed or suggested in Wolf. As such, claim 13 is not rendered obvious by Kledzik and Wolf, taken separately or in combination.

For at least the reasons discussed above, Applicant respectfully requests that the rejection of claim 13 under 35 U.S.C. § 103(a) be withdrawn and this claim be allowed.

CONCLUSION

Applicant respectfully requests that the pending claims be allowed and the case passed to issue. Should the Examiner wish to discuss the Application, it is requested that the Examiner contact the undersigned at (415) 772-7428.

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12/26/06 Richard A. Park
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